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FACEBOOK, INC. and MARK ZUCKERBERG

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

FACEBOOK, INC. and MARK ZUCKERBERG,

Plaintiffs,

v.

CONNECTU, INC. (formerly known as CONNECTU, LLC), CAMERON WINKLEVOSS, TYLER WINKLEVOSS, DIVYA NARENDRA, PACIFIC NORTHWEST SOFTWARE, INC., WINSTON WILLIAMS, WAYNE CHANG, and DAVID GUCWA,

Defendants.

Case No. 5:07-CV-01389-RS

DECLARATION OF YVONNE P. GREER IN SUPPORT OF REPLY MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF FACEBOOK'S MOTION TO COMPEL PACIFIC NORTHWEST SOFTWARE AND WINSTON WILLIAMS TO PROVIDE COMPLETE AND SUPPLEMENTAL RESPONSES TO FACEBOOK'S FIRST SET OF INTERROGATORIES NOS. 3 AND 4

Date: December 14, 2007
Time: 9:30 A.M.
Judge: Hon. Richard Seeborg

Dockets.Justia.com

I, Yvonne P. Greer, declare as follows:

1. I am an associate at the law firm of Orrick, Herrington & Sutcliffe, counsel for Plaintiffs Facebook, Inc. and Mark Zuckerberg in this action, and a member of the Bar of the state of California. I make this declaration in support of the Reply Memorandum of Points and Authorities in Support of Facebook's Motion to Compel Pacific Northwest Software and Winston Williams to Provide Complete and Supplemental Responses to Facebook's First Set of Interrogatories Nos. 3 and 4. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. Attached hereto as **Exhibit M** is a true and correct copy of a document produced by iMarc at bates numbers iMarc001529-1531. Defendant Pacific Northwest Software, Inc. ("PNS") produced a version of this document at bates numbers PNS000556-558.

3. This document represents another example of the evidence provided in Section C to Plaintiff Facebook, Inc.'s Reply Memorandum of Points and Authorities in Support of Facebook's Motion to Compel Pacific Northwest Software and Winston Williams to Provide Complete and Supplemental Responses to Facebook's First Set of Interrogatories Nos. 3 and 4 that proves that PNS' and Williams' prior responses to Interrogatories Nos. 3 and 4 are incomplete. This document is an email from Cameron Winklevoss to several individuals involved with the development of the Facebook Importer and Social Butterfly programs. There are multiple references to the IP address 24.22.165.112 as being Winston Williams' own IP address. This IP address was not listed in either PNS' or Williams' prior responses to Interrogatories Nos. 3-4.

I declare under penalty of perjury that the forgoing is true and correct to the bet of my knowledge. Executed this 19th of November, 2007, at Menlo Park, California.

/s/ Yvonne P. Greer /s/
Yvonne P. Greer

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on November 19 2007.

Dated: November 19, 2007

Respectfully submitted,

/s/ Yvonne P. Greer /s/
Yvonne P. Greer